UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KUBOTA NORTH AMERICA CORPORATION,
Petitioner,

v.

VERMEER MANUFACTURING COMPANY,
Patent Owner.

IPR2025-00168
U.S. Patent No. 9,321,386

Filed: January 28, 2026

PATENT OWNER'S
REQUEST FOR ORAL ARGUMENT

I. Introduction

Pursuant to the Board's Scheduling Orders (Papers 18, 21, and 31) and 37 C.F.R. § 42.70(a), Patent Owner Vermeer Manufacturing Company ("Patent Owner") respectfully requests oral argument, as currently scheduled on March 19, 2026, for IPR2025-00168.

The Board has scheduled one consolidated hearing (if requested) to address the following *inter partes* review proceedings: IPR2025-00167, IPR2025-00168, IPR2025-00169, IPR2025-00170, and IPR2025-00171. *See* Scheduling Orders (Papers 18, 21, and 31). IPR2025-00167 through IPR2025-00169 challenge U.S. Patent No. 9,321,386; IPR2025-00170 challenges U.S. Patent No. 9,975,750; and IPR2025-00171 challenges U.S. Patent No. 10,202,266.

In addition to these five *inter partes* review proceedings, there are two related proceedings scheduled for oral argument (if requested) on March 20, 2026: IPR2025-00381 and PGR2025-00016. *See* IPR2025-00381, Scheduling Order (Paper 12); PGR2025-00016, Scheduling Order (Paper 14). IPR2025-00381 challenges U.S. Patent No. 11,465,891 and PGR2025-00016 challenges U.S. Patent No. 12,098,063. If convenient for the Board, Patent Owner respectfully proposes consolidating the March 19th and 20th hearings to address all seven proceedings at once. Patent Owner has conferred with Petitioner on this proposed consolidation and Petitioner does not oppose the request.

II. Preferred Location

Patent Owner has conferred with Petitioner and the parties have agreed to an in-person hearing at the USPTO headquarters in Alexandria, Virginia, if the Board allows.

III. Preferred Time to Present Arguments

Patent Owner has conferred with Petitioner and the parties have agreed to sixty (60) minutes of argument per side.

If the hearings are consolidated, Petitioner has indicated it would request ninety (90) minutes of argument per side. However, it is Patent Owner's position that, due to the overlapping issues between the proceedings, sixty (60) minutes of argument per side is sufficient for a consolidated hearing.

IV. Issues to Be Argued

Patent Owner specifies the following issues, without intent to waive consideration of any issue not explicitly presented, to be argued:

1. Whether Petitioner has established that claims 31–36, 38–39, 41–44, 45–49, and 86–87 of U.S. Patent No. 9,321,386 are obvious over KR 10-1041996 ("KR996") (EX1005) in view of JP 2004-17705 ("JP705") (EX1006);

2. Whether Petitioner has established that claims 37, 40, and 70–79 of U.S. Patent No. 9,321,386 are obvious over KR996 in view of JP705 and U.S. Patent No. 6,832,659 ("Bares") (EX1010);
3. Any claim construction issues raised in the parties' papers;
4. Any other issues addressed in the Petition (Paper 3), Institution Decision (Paper 16); Patent Owner Response (Papers 22 and 23), Petitioner Reply (Paper 33), Patent Owner Sur-Reply (Paper 37), or Petitioner Request for Oral Argument;
5. Any issues concerning motions to exclude or motions to strike that may be filed by either party; and
6. Any issues otherwise raised by the Board.

Date: January 28, 2026

Respectfully submitted,

/Richard L. Brophy/

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Under 37 C.F.R. § 42.6(e), the undersigned certified that on January 28, 2026, a copy of Patent Owner's Request for Oral Argument was served via electronic mail on the following attorneys of record:

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Dated: January 28, 2026

By: *_/Richard L. Brophy/_*
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